

FILED

JAN 16 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,) No.
)
v.)
)
ALPHEUS BASS,)
)
Defendant.)
)

4:19CR00035 RLW/PLC

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about December 6, 2018, within the Eastern District of Missouri, the defendant,

ALPHEUS BASS,

did knowingly and intentionally distribute actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT II

The Grand Jury further charges that:

On or about December 6, 2018, within the Eastern District of Missouri, the defendant,

ALPHEUS BASS,

did knowingly and intentionally possess, with the intent to distribute, one or more controlled substances, in violation of Title 21, United States Code, Section 841(a)(1) and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT III

The Grand Jury further charges that:

On or about December 6, 2018, within the Eastern District of Missouri, the defendant,

ALPHEUS BASS,

did knowingly and intentionally use, carry, and possess a firearm in furtherance of a drug trafficking crime, to-wit: possession with the intent to distribute a controlled substance as charged in Count II.

In violation of Title 18, United States Code, Section 924 (c)(1)(A) and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE ALLEGATION

1. The allegations of Count I of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. The property, real and personal of defendant **ALPHEUS BASS**,
(a) constituting, or derived from, any proceeds the defendants obtained,
directly or indirectly, as a result of the violation of law set out in Counts I and II of this
Indictment; and

(b) used, or intended to be used, in any manner or part to commit or to
facilitate the commission of such violations is property subject to forfeiture pursuant to Title 21,
United States Code, Section 853(a).

3. Specifically subject to forfeiture is approximately \$3,000.00 in United States
Currency in that such sum in the aggregate is property constituting, or derived from, any

proceeds the defendants obtained, directly or indirectly, as a result of the offense alleged in Counts I and II.

4. Properties subject to forfeiture as set out at paragraph 2 and 3 above include, but are not limited to:

- (a) The interest of **ALPHEUS BASS** in
 - (i) Glock 21 .45 caliber firearm, serial number WTH468
 - (ii) Glock 17 9 mm fireare, serial number CME979US
 - (iii) Glock 19 9 mm firearm, serial number ACLC809
 - (iv) Browning .22 caliber firearm, serial number 51EZY12879
 - (v) Draco 7.62 x 39 mm firearm, serial number DA-83L8-15RO
 - (vi) Anderson Manufacturing AR-15 .223 assault rifle, serial number 1642822

5. If any of the property described in paragraphs 2, 3, and 4 above as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in paragraphs 2, 3 and 4 above, or elsewhere, as being subject to forfeiture.

A TRUE BILL.

FOREPERSON

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